

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

JASON KESSLER

and

DAVID MATTHEW PARROTT,

*Plaintiff,*

v.

Civil Action No. **3:19-CV-00044**

CITY OF CHARLOTTESVILLE,  
TARRON J. RICHARDSON, in his  
official capacity, AL S. THOMAS in his  
individual capacity, BECKY CRANNIS-CURL  
in her individual capacity, MAURICE JONES  
in his individual capacity,

*Defendants.*

**CONSENT MOTION FOR AMENDMENT OF PROPOSED PRETRIAL ORDER**

COME NOW Defendants, City of Charlottesville, Tarron J. Richardson, Al S. Thomas, Becky Crannis-Curl and Maurice Jones, and Plaintiffs Jason Kessler and David Matthew Parrott, by counsel, and after conferring, jointly move and request that the Court amend the proposed Pretrial Order to change the date that triggers deadlines for the Rule 26(f), F.R.C.P. conference, the Rule 26(a), F.R.C.P. initial disclosures, and each party's initial expert disclosures and setting any trial date to the date the Court rules on Rule 12(b)(6), F.R.C.P. motions to dismiss, which the parties jointly anticipate will be filed on or before October 25, 2019. The parties, by counsel, have further agreed to stay all discovery in this matter until after the Court rules on the anticipated Rule 12(b)(6), F.R.C.P. motions. All other provisions of the proposed Pretrial Order are agreed.

CITY OF CHARLOTTESVILLE,  
TARRON RICHARDSON, CITY MANAGER  
By Counsel

AL THOMAS  
By Counsel

BECKY CRANNIS-CURL  
By Counsel

MAURICE JONES  
By Counsel

JASON KESSLER and  
DAVID MATTHEW PARROTT  
By Counsel

WE ASK FOR THIS:

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Tarron Richardson, City Manager*

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*Counsel for Becky Crannis-Curl*

s/Rosalie Pemberton Fessier

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*Counsel for Maurice Jones*

s/Elmer Woodard

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*Counsel for Plaintiffs*

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*Counsel for Plaintiffs*

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 6<sup>th</sup> day of September, 2019, I electronically filed the foregoing Consent Motion for Amendment of Proposed Pretrial Order with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/Richard H. Milnor